## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankr. No. 23-22810 CMB
CHRISTOPHER P. WANEY,	)
SR.,	) Chapter 13
Debtor.	)
	) Docket No. 39
LAKEVIEW LOAN	) Related to Docket No. 37
SERVICING,	)
Movant,	) Hearing Date & Time:
	)
vs.	) Claim No. 13
CHRISTOPHER P. WANEY,	)
SR. AND RONDA J.	)
WINNECOUR, CHAPTER 13	)
TRUSTEE,	)
Respondens.	)

## **DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtor, Christopher P. Waney, Sr., by and through his attorney, who respectfully represents the following:

- 1. On or about December 31, 2023, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
- 2. Lakeview Loan Servicing filed a Notice of Mortgage Payment Change on 10/28/2024
- a) The monthly mortgage payment of \$1,020.61 is being increased to \$1,088.56 effective 12/1/2024.
  - 3. In all other respects the Declaration that was filed shall remain the same.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment according to the above referenced Notice of Mortgage Payment Change commencing with the next distribution in the effective amounts.

Date: 10/28 /2024

Respectfully submitted.
/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtors
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## **CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 30th day of October, 2024, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire Chapter 13 Trustee cmecf@chapter13trusteewdpa.com Lakeview Loan Servicing Attn: Brett J. Lemon, Esq. bkgroup@kmllawgroup.com

By: /s/ Rodney D. Shepherd Rodney D. Shepherd Attorney for the Debtor PA I.D. No. 56914 rodsheph@cs.com 2403 Sidney Street Suite 208 Pittsburgh, PA 15203 412 471-9670